

SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA

CHURCH OF SCIENTOLOGY)
INTERNATIONAL)
4751 Fountain Avenue)
Los Angeles, CA 90029)

Plaintiff,)

v.)

Civil Action No. _____

BENT CORYDON)
2390 Prenda)
Riverside, CA 92504)

Defendant.)

CA 8048-87

VERIFIED COMPLAINT FOR DAMAGES FOR DEFAMATION

Plaintiff, by its attorneys, for its complaint
against defendant, alleges as follows:

I. NATURE OF THE ACTION

1. This is an action for damages caused by
defendant's publication over radio station WNTR of false
and defamatory statements of and concerning plaintiff.

II. JURISDICTION AND VENUE

2. Jurisdiction of this Court is founded on D.C.
Code (1981 Edition) Section 11-921 and Section 13-423.
Venue is based upon the origin of publication and
publication in the District of Columbia.

III. PARTIES

3. Plaintiff Church of Scientology

International, is a not-for-profit religious corporation
duly organized under the laws of the State of California.
Plaintiff conducts its activities throughout the United
States including the District of Columbia, and is the
Mother Church of the Churches of Scientology in the United
States. Since 1981, Rev. Heber Jentzsch has been the

president of the Church of Scientology International and has represented plaintiff as its president throughout the United States, including the District of Columbia.

Plaintiff maintains a permanent office in Washington, D.C.

4. Defendant is the author of a book entitled "L. Ron Hubbard Messiah or Madman?", published by Lyle Stuart, Inc. (herein "book").

IV. CAUSE OF ACTION

5. On August 17, 1987, defendant appeared on radio station WNTR as a guest to promote his book on a show known as "Battleline."

6. WNTR broadcasts the "Battleline" show throughout the greater Washington, D.C. metropolitan area and in other areas including Long Island, New York and North Carolina. The show of August 17, 1987, and the particular defamatory statements alleged in paragraph 7 below, were heard throughout those areas and by members of the public who knew and/or understood that Heber Jentzsch is the president of plaintiff Church.

7. While appearing on the "Battleline" show on August 17, 1987, in Washington, D.C., defendant published the following false and defamatory statements of and concerning plaintiff:

Well for one thing well after I had started writing the book a fellow arrived about 6 foot 4 with a leather jacket on and leather gloves, and very strong looking fellow and he came into the place where I work and he was looking for me all over the building. He failed to find me, I happened to be off in another room I just happened to be hiding (inaudible) from him and he finally settled on somebody who's a good friend of mine and he said that Bent Corydon isn't here you'll do and he started smacking him around and yelling that he stood in the way of L. Ron Hubbard's bridge. Now just last week, this was over a year ago, just last week, not the same person, but a fellow similar description, a certain (inaudible) a leather jacket, a black leather gloves the works, followed me out of CNN-TV station and began to follow me out to the parking lot. This is subsequent to the President of the

Church, Heber Jentzsch, pointing at me from outside this fellow went immediately straight towards me. I went back into the building and stood next to the guard. This fellow came in and leaned over me and said something intimidating, I don't remember the exact words.

8. By the aforesaid defamatory statements alleged in paragraph 7 above, defendant intended to convey and did convey to the listening audience the following false and defamatory meanings of and concerning plaintiff:

A. Plaintiff engaged in criminal conduct in that it directed and caused a physical assault on a friend of Corydon's;

B. Plaintiff engaged in criminal conduct in that it directed and caused a threat of physical assault on Corydon;

C. Plaintiff directed and caused a friend of Corydon's to be physically assaulted;

D. Plaintiff directed and caused Corydon to be threatened with physical harm;

E. Plaintiff directed that Corydon be physically assaulted;

F. Corydon would have been physically assaulted pursuant to plaintiff's directions if he had not found a guard to stand next to.

9. The audience that heard defendant's aforesaid defamatory statements of and concerning plaintiff understood said statement to have the false and defamatory meaning alleged in paragraph 8 herein.

10. The reasonable meanings of the aforesaid defamatory statements of and concerning plaintiff were the false and defamatory meaning alleged in paragraph 8 herein.

11. The aforesaid defamatory statements were understood by the audience that heard them to be of and concerning activities and conduct of the plaintiff in that said audience knew that plaintiff's President was and is Heber Jentzsch, who was specifically referred to by

defendant as being involved as President of the Church in the alleged actions charged by defendant. Members of the audience further knew and understood that plaintiff had described and alleged incidents as occurring in an area of California where defendant has its principal offices.

12. By the aforesaid defamatory statements and by their false and defamatory meanings as alleged herein, defendant charged plaintiff with criminal, illegal and unlawful conduct, with conduct entirely improper and contrary to the standards of a religious organization and with malicious and unethical conduct.

13. Plaintiff's reputation, credibility and ability to function as a Church require that it be viewed as an ethical and moral institution that does not engage in either criminal or violent conduct.

14. Defendant knew that the aforesaid defamatory statements set forth above were false and/or published them in reckless disregard of their truth or falsity.

15. The aforesaid defamatory statements set forth above were published by defendant acting in a grossly irresponsible manner in failing to determine their truth or falsity, in failing to follow any responsible standards and practices in determining their truth or falsity, and in knowing that he did not know whether the statements were true.

16. The aforesaid defamatory statements set forth above were published by defendant acting with culpable negligence and in reckless disregard of and indifference to plaintiff's rights and to their truth or falsity, and the damaging consequences that publication of such statements could cause.

17. The aforesaid defamatory statements are utterly false.

18. By reason of the aforesaid acts of defendant, plaintiff has suffered serious damage to its good name and reputation, and has been injured in its ability to conduct

religious affairs and to advance and disseminate the principals and practices of Scientology.

19. Plaintiff has sent to defendant a written request to retract and correct the statements in paragraph 7 above pursuant to California Civil Code Section 48(a). The defendant has not as of this time issued any retraction, nor will he retract in any regard.

20. As a result, plaintiff has suffered actual damages in an amount in excess of \$100,000.00.

21. By virtue of defendant's conduct, plaintiff is entitled to recover punitive damages from defendant in an amount in excess of \$200,000.00.

WHEREFORE, plaintiff demands judgment against defendant, as follows:

- (a) in an amount no less than
\$100,000.00 in actual damages
together with interest thereon;
- (b) in an amount no less than
\$200,000.00 in punitive damage;
- (c) the costs and disbursement of
this action including
reasonable allowances for
counsel fees and other lawful
expenses; and
- (d) such other further relief as
the Court may find just and
proper under the circumstances.

Plaintiff hereby demands a trial by jury of twelve.

DATED: Washington, D.C.
September 15, 1987

District of Columbia, ss:

Sylvia Stanard, being first duly sworn on oath says the foregoing is a just and true statement of the amount owing by defendant to plaintiff, exclusive of all set-offs and just grounds of defense.

Sylvia Stanard

On behalf of Plaintiff,
Church of Scientology International

Subscribed and sworn to before me this 18th day of September, 1987.

My Commission Expires Jan. 1, 1990

Helen P. Jovanetti
Notary Public

a.c.h.
Anthony P. Bisceglie, #249201
William C. Walsh, #245621
O'TOOLE, BISCEGLIE & WALSH
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Local Counsel of Record for
Plaintiff

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Co-Counsel for Plaintiff

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4751 Fountain Avenue
Los Angeles, CA 90029

Plaintiff,

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BENT CORYDON
2390 Prenda
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Defendant.

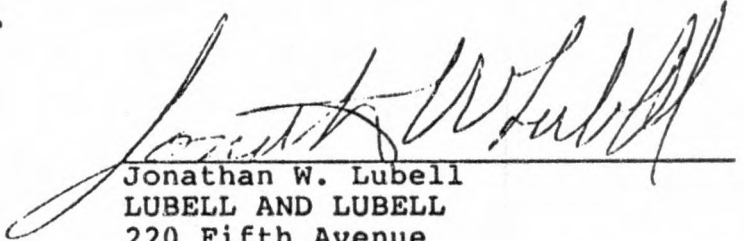
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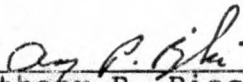
PRAECIPE FOR APPEARANCE PRO HAC VICE

I, JONATHAN W. LUBELL respectfully submit this praecipe pursuant to Rule 101, District of Columbia Superior Court rules, for purposes of entering an appearance on behalf of Plaintiff in the above captioned case.

I am a member in good standing of the bar of the State of New York, and the United States Supreme Court, and in the United States Court of Appeal for the District of Columbia, Second and Ninth Circuits. On one previous occasion I sought to appear in the Superior Court under this Rule and my application was granted.


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New York, New York 10001
(212) 683-5000

Co-Counsel for Plaintiff


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Suite 400
Washington, D.C. 20036
(202) 778-1160

Local Counsel of Record for
Plaintiff

(VERIFICATION — 446, 2015.5 C. C. P.)

STATE OF CALIFORNIA, COUNTY OF

I am the

in the above entitled action or proceeding; I have read the foregoing

and know the contents thereof; and I certify that the same is true of my own knowledge, except as to those matters which are therein stated upon my information or belief, and as to those matters I believe it to be true.

I declare, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____ at _____, California
(date) (place)

(Signature)

PROOF OF SERVICE BY MAIL (1013a, 2015.5 C. C. P.)

STATE OF CALIFORNIA, COUNTY OF

I am a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my business address is:

P.O. Box 511, Pacific Palisades, Ca. 90272

On November 7, 19 88 I served the within Reply to Opposition
to Unseal

on the Parties

in said action, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the

United States mail at
addressed as follows:

Eric M. Lieberman
Rabinowitz, Boudin, Standard
Krinsky & Lieberman, P.C.
740 Broadway, Fifth Floor
New York NY 10003-9518

Timothy Bowles
Bowles & Moxon
6255 Sunset Blvd. Suite 2000
Hollywood CA 90028

Michael L. Hertzberg
740 Broadway, Fifth Floor
New York, NY 10003-9518

I declare, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 11/7/88 at Los Angeles, California
(date) (place)

STATE OF CALIFORNIA, COUNTY OF

I am the _____

in the above entitled action or proceeding; I have read the foregoing _____

and know the contents thereof; and I certify that the same is true of my own knowledge, except as to those matters which are therein stated upon my information or belief, and as to those matters I believe it to be true.

I declare, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____ at _____, California
(date) (place)

(Signature)

PROOF OF SERVICE BY MAIL (1013a, 2015.5 C. C. P.)

STATE OF CALIFORNIA, COUNTY OF

I am a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my business address is:

P.O. Box 511, Pacific Palisades, Ca. 90272

On December 23, 1988 I served the within RESPONSE TO WRIT OF

SUPERSEDEAS

on the Parties
in said action, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the
United States mail at _____
addressed as follows:

see attached list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
Executed on 12/22/88 at LOS ANGELES, California
(date) (place)

Felicia Zausbury

Proof of Service

Mr. Kendrick Moxon
Mr. Timothy Bowles
6255 Sunset Boulevard
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Los Angeles CA 90028

Mr. Eric Lieberman
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Clerk of Superior Court
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